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Nanayaa Ampoma
Regeneration and Planning
Development Management
London Borough of Camden
Town Hall
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WC1H 8ND

15 May 2015

Our Ref: NH/15-2395

Dear Ms Ampoma,

Proposed change of use of ground floor from retail unit (Class A1) to betting shop (Sui Generis) at 64 Kilburn High Road NW6 4HJ (Reference: 2015/1549/P)

We have now had the opportunity to consider the objections received in respect of the above application. Please note that the objections from RR Planning and Elias Topping are submitted on behalf of other betting shop operators.

Saturation of Betting Shops

Most objections have been made on the grounds that Kilburn High Road has a concentration of betting shops and has reached saturation point. It is also argued that the proposals would not help the town centre in terms of choice and competitiveness. This is simply not the case. It should be emphasised that there are currently only three betting shops within the Primary Shopping Frontage (PSF) of Kilburn High Road Town Centre, all of which sit on the Brent side. The PSF has a total of 142 units. The existing three betting shops constitute just 2.1% of the total PSF units. This would rise to 2.8% of the PSF should permission be granted for the change of use of the unit.

Should the proposal be granted, the unit would be the only betting shop within Camden's PSF. This clearly demonstrates that there is not a saturation of betting shops within the PSF.

Whilst the PSF is the most relevant frontage to the proposals, objections also relate to the wider centre, inclusive of the Secondary Shopping Frontage (SSF). The SSF has 271 units across the Brent and Camden boundary. Just four of these units are betting shops which constitutes a mere 1.5% of the units. Within the Camden SSF, one unit from a total of 86 is within betting shop use, constituting 1.2%.

Of the 413 units which make up Kilburn High Road Town Centre, just seven of these units are within betting shop use (1.7%). With a change of use of the application site, the 8th betting shops would increase this percentage to 1.9%.

It cannot be said that such a low percentage of the total units constitutes a concentration of betting shops, particularly given that these units are spread evenly throughout the centre.

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There is already a Paddy Power on Kilburn High Road

One objector states that there is already a large Paddy Power shop on Kilburn High Road. This unit is approximately 690 metres away which equates to a 9 minute walk at an average pace. Given that the existing Paddy Power is at one extreme end of the centre and the proposed Paddy Power is at the other extreme end, it is unlikely that you would walk past both units during a shopping trip, or that it would give rise to a perception of overconcentration of these uses.

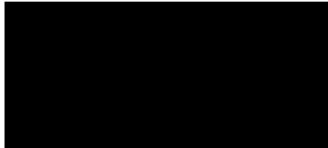
Loss of an A1 Shop

A number of respondents have objected on the grounds that the proposals will result in the loss of an active Class A1 retail use. The unit is currently occupied by an unauthorised squatter who pays no rent or rates to the landlord. The unit has failed to attract any firm offers from an A1 retail since 27 December 2013 when Barratts vacated the premises. A letter from Nash Bond who have marketed the property since this date confirms that the large amount of space over the first, second and third floors, making the space relatively more expensive in terms of fixed repairing liabilities and business rates to similarly sized ground floor lock up shops, has caused a long term void. Additionally, they say that as a result of few local retailers being able to afford to start up new ventures and the national multiple operators consolidating into fewer, larger retailing locations demand in previous prime areas of Kilburn is languishing. Void rates in the locality are higher than historic rates and a change of use is described as essential due to the difficulties in letting the premises to an A1 user within the short to medium term.

We have submitted robust marketing information demonstrating that there has been no interest in the unit from a permanent A1 retailer over the past 17 months. This is an important consideration which must outweigh the loss of an A1 unit in order to improve the image of the centre, secure the unit and help improve vitality and viability.

We trust that our response will be given full consideration in the determination of the application.

Yours sincerely,



Niall Hanrahan
Assistant Planner
Planning Potential